

UNITED STATES DISTRICT COURT

for the
Eastern District of Virginia

United States of America
v.
JOHN WILLIAM KIRBY KELLEY
a/k/a "Carl,"
a/k/a "BotGod"

Case No. 1:20-mj-4

Defendant(s)



CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 2018 to February 2019 in the county of Norfolk in the
Eastern District of Virginia, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 371

Conspiracy to commit an offense against the United States, that is, to transmit in interstate commerce communications containing threats to injure the person of another.

This criminal complaint is based on these facts:
Please see the attached Affidavit.

☒ Continued on the attached sheet.

Reviewed by AUSA/SAUSA:

AUSA Carina A. Cuellar

Complainant's signature

FBI Special Agent, Jonathan M. Lund

Printed name and title

Sworn to before me and signed in my presence.

Date: 01/08/2020

City and state: Alexandria, Virginia

/s/
Theresa Carroll Buchanan
United States Magistrate Judge

Judge's signature

Theresa Carroll Buchanan, U.S. Magistrate Judge

Printed name and title